## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

Vari-Volt Technologies, LLC,	§
	§
Plaintiff,	§
	<b>§ Case No. 6:16-cv-01042-RWS-KNM</b>
<b>v.</b>	<b>§</b>
	<b>§</b>
Perfection Pen LLC, a California	<b>§</b>
corporation	§ JURY TRIAL
	§
<b>Defendants.</b>	§
	§
	§
	§

## MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Vari-Volt Technologies, LLC ("VARI-VOLT") hereby files this Motion to Stay All Deadlines and Notice of Settlement. The parties have reached an agreement in principle to settle all matters in controversy between them and are in the process of executing a written settlement agreement. The parties wish to conclude this matter without burdening the Court with any additional filings and without incurring unnecessary expenses. Therefore, VARI-VOLT requests a stay of thirty (30) days as to all deadlines between VARI-VOLT and Defendant Perfection Pen, LLC to allow sufficient time for execution of the agreement, and the case to be subsequently dismissed.

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DATED: March 15, 2017 Respectfully submitted,

/s/ Rasheed M. McWilliams

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Counsel for Plaintiff Var-Volt Technologies, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by mal on March 15, 2017.

<u>s/Rasheed M. McWilliams</u>